

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ERIN WILSON, *individually and on  
behalf of others similarly situated,*

Plaintiff,

v.

McNamara Chiropractic LLC,

Defendant.

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CIVIL ACTION NO.  
**2:25-cv-00201-SCJ**

**JOINT MOTION TO EXTEND DEADLINE FOR JOINT PRELIMINARY  
REPORT AND DISCOVERY PLAN**

For good cause shown below, Plaintiff Erin Wilson, individually and on behalf of others allegedly similarly situated (“Plaintiff”), and Defendant McNamara Chiropractic LLC (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, respectfully move this Court for a brief fourteen (14) day extension of the deadline for the Parties to file a Joint Preliminary Report and Discovery Plan, through and including October 29, 2025. In support of this Motion, the Parties state good cause exists to grant the requested extension as follows:

1. The Parties have been engaged in ongoing, substantive discussions regarding the potential resolution of this matter on an individual basis.

2. Additional time is needed for the Parties to continue these settlement discussions in good faith and to incorporate any relevant developments into the forthcoming Joint Preliminary Report and Discovery Plan.

3. Indeed, the brief extension may allow the Parties resolve the claims at issue in this case, thereby eliminating the need for the Court to use its resources addressing them. As such, granting the request will further judicial economy and conserve resources.

4. This is the Parties' first request for an extension of this deadline.

5. The requested extension is sought in good faith, is not made for purposes of delay, and will not prejudice any party or unduly burden the Court.

**WHEREFORE**, the Parties respectfully request that the Court extend the deadline for filing a Joint Preliminary Report and Discovery Plan by fourteen (14) days from October 15, 2025 through October 29, 2025.

Respectfully submitted this 15<sup>th</sup> day of October 2025.

**PARONICH LAW, P.C.**

/s/ Anthony Paronich

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**JACKSON LEWIS P.C.**

/s/ Jason Gavejian

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*Attorneys for Defendant*

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**CERTIFICATE OF SERVICE**

I certify that on October 15, 2025, I electronically filed the foregoing **JOINT MOTION TO EXTEND DEADLINE FOR JOINT PRELIMINARY REPORT AND DISCOVERY PLAN** with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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